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Attorneys for Defendant
SUTHERLAND GLOBAL SERVICES INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SELENA ESCOBAR, an Individual,
Plaintiff,

vs.

SUTHERLAND GLOBAL SERVICES
INC., a Foreign Corporation,
Defendant.

Case No. 2:20-cv-02301-GMN-EJY

**STIPULATION TO EXCUSE DEFENDANT
SUTHERLAND GLOBAL SERVICES
INC.'S INSURANCE REPRESENTATIVE
FROM ATTENDANCE AT THE EARLY
NEUTRAL EVALUATION SESSION**

**United States Magistrate Judge
Cam Ferenbach**

**ENE Date: March 25, 2021
ENE Time: 10:00 a.m.**

Plaintiff SELENA ESCOBAR ("Plaintiff") and Defendant SUTHERLAND GLOBAL SERVICES INC. ("Defendant"), by and through their attorneys of record, hereby submit this stipulation for an exemption from the Early Neutral Evaluation ("ENE") requirements for Defendant's insurance representative.

The Order Scheduling the ENE requires a representative of Defendant's insurance carrier with authority to settle this matter up to the full amount of the claim be present. (ECF No. 12 at 2:4-7). Defendant respectfully requests that the Court issue an order excusing Defendant's insurance

representative from attendance at the ENE session. Coverage in this matter is subject to a substantial \$250,000.00 self-insured retention. Based on the information presently available regarding Plaintiff and her allegations in this lawsuit, there is no reasonable good faith likelihood that Plaintiff's claims exceed the substantial retention level at this time. In light of the status of the litigation, it is Defendant's belief that insurance coverage will not have any effect on the settlement negotiations at the ENE. Additionally, Defendant's corporate representative, René Lafferty, is prepared to fully and actively participate in the ENE and has binding authority to settle the matter.

Because Defendant will have fully-adequate representation at the ENE, the parties stipulate and request the Court excuse Defendant's insurance representative from the ENE session.

Dated: March 4, 2021

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Respectfully submitted,

Respectfully submitted,

/s/ Jenny L. Foley

/s/ Diana G. Dickinson

JENNY L. FOLEY, PH.D., ESQ.
 REX M. MARTINEZ, ESQ.
 HKM EMPLOYMENT ATTORNEYS LLP

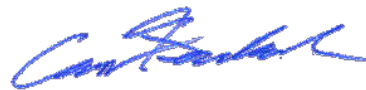
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 DIANA G. DICKINSON, ESQ.
 LITTLER MENDELSON, P.C.

Attorneys for Plaintiff
 SELENA ESCOBAR

Attorneys for Defendant
 SUTHERLAND GLOBAL SERVICES INC.

IT IS SO ORDERED.

March 5
 Dated: _____, 2021.



UNITED STATES MAGISTRATE JUDGE

4836-6808-1116.1 061963.1042